

Hearing Date: June 25, 2019 at 2:00 p.m. (EST)
Objections Due: June 14, 2019 at 4:00 p.m. (EST)

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Counsel for the Foreign Representative

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 18-11094 (SCC)
(Jointly Administered)

**NOTICE OF FOREIGN REPRESENTATIVE'S (1) MOTION FOR LEAVE TO FILE
UNDER SEAL; AND (2) MOTION FOR ORDER PURSUANT TO BANKRUPTCY
CODE SECTIONS 105(a), 362, 363, 1520(a)(2), 1520(a)(3) AND 1521(a)(7)
AUTHORIZING ENTRY INTO A LITIGATION INTEREST AGREEMENT
AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that a hearing (the “Hearing”) will be held before the Honorable Shelley C. Chapman of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) on **June 25, 2019 at 2:00 p.m. (Prevailing Eastern Time)**, in Courtroom 623, One Bowling Green, New York, New York 10004, to consider the motions (the “Motions”) of Gonzalo Gil-White, in his capacity as foreign representative (the “Foreign Representative”) of Perforadora Oro Negro, S. de R.L. de C.V. and Integradora de Servicios Petroleros, S.A.P.I. de C.V. (together, the “Debtors”) in the above-captioned proceeding, seeking (1) entry of an order pursuant to Bankruptcy Code section 107(b), Rule 9018 of the Federal Rules of Bankruptcy Procedure, and Local Bankruptcy Rule 9018-1 authorizing the Foreign Representative to file an un-redacted copy of the *Motion of Foreign Representative for Order Pursuant to Bankruptcy Code Sections 105(a), 362, 363, 1520(a)(2), 1520(a)(3) and 1521(a)(7) Authorizing Entry into a Litigation Interest Agreement and Granting Related Relief* and exhibits thereto under seal (the “Motion to Seal”) [ECF 204]; and (2) for an Order Pursuant to Bankruptcy Code Sections 105(A), 362, 363, 1520(A)(2), 1520(A)(3) and 1521(A)(7) Authorizing Entry into a Litigation Interest Agreement (the “Motion for Authorization”) [ECF 205].

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motions must (i) conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York (the “Local Rules”); (ii) be made in writing; (iii) state with particularity the grounds therefor; (iv) be filed with the Bankruptcy Court (with a copy to the Judge’s chambers); and (v) be served upon Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, New York 10010, Attn: Scott C. Shelley, Esq., so as to be received no later than 4:00 p.m. (prevailing Eastern Time) on **June 14, 2018** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if an objection to the Motions is not received by the Objection Deadline, the relief requested shall be deemed unopposed, and the Bankruptcy Court may enter an order granting the relief sought without a hearing on any date after the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that objecting parties are required to attend any hearing set by the Court, and failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motions.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

Dated: June 7, 2019
New York, New York

QUINN EMANUEL URQUHART &
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/s/ Gabriel F. Soledad
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